

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	No. 20 CR 309
LARRY JONES,	)	
	)	
Defendant.	)	Judge Virginia M. Kendall

**MOTION TO MODIFY DEFENDANT JONES' BOND ALLOWING  
HIM TO LIVE IN HIS HOME WITH THE MOTHER OF HIS SON  
AND HIS SON, MAKING HER HIS THIRD PARTY CUSTODIAN,  
AND OTHER CONDITIONS AS SUGGESTED BY PRETRIAL  
SERVICES**

Defendant Larry Jones, by his attorney, Phillip A. Turner, respectfully requests that this court enter an order modifying defendant Jones' bond to allow him to reside at his home with his son and his son's mother, making her his third party custodian, and other conditions as suggested by Pretrial Services. In support of this motion, defendant states the following:

1. Defendant Larry Jones has been completely compliant with all conditions of his bond. Defense counsel has contacted the pretrial services officer, Samuel Schroeder, to discuss proposed changes in defendant Jones' bond, however, the officer cannot investigate the feasibility of changes without a motion being filed.

2. Currently, defendant Jones resides with his grandmother, Jeraldine Moore, who is 79 years old in Chicago, Illinois. She has some pre-existing medical conditions such as diabetes, heart issues, and anxiety. She does not work. Defendant Jones does work every day performing manual labor at various sites with 10 to 20 other laborers. He is in close contact with these other individuals. When he is at his grandmother's home, he tries to maintain his distance from her to try to avoid infecting her with COVID-19.

3. His son and his son's mother, Shinesha Huston, reside in Broadview, Illinois where defendant Jones lived prior to his arrest. She and defendant Jones have been together for 20 years and lived at this location for approximately 6 years. Their son is a senior at Willowbrook High School.

Wherefore, defendant respectfully requests that this Court enter an order allowing Pretrial Services to investigate and make the suggested modifications to defendant Jones's bond if Pretrial Services believes that they are appropriate as well as any other modifications.

Respectfully submitted,  
Phillip A. Turner  
/s/Phillip A. Turner  
Attorney for defendant  
20 North Clark Street  
Suite 3300  
Chicago, Illinois 60602  
312-899-0009

## CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that in accordance with Fed.R.Civ.P.5, LR 5.5 and the General Order on Electronic Case Filing (ECF), the following document:

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was served pursuant to the district court's ECF system as to ECF filers.

Respectfully submitted,

Phillip A. Turner\_\_\_\_\_  
Phillip A. Turner  
Attorney for defendant  
20 North Clark Street  
Suite 3300  
Chicago, Illinois 60602  
312-899-0009